

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*  
Plaintiffs,

v.

Civ. Action No.: 14-cv-00029-AB

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,  
Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**AMENDED STIPULATION AND ~~PROPOSED~~ ORDER<sup>1</sup>**

This Stipulation and Agreement, dated May 19, 2015, as amended as of this 30th day of June 2015, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an

<sup>1</sup> Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Players Chidi Ahanotu, Terrell Davis, Brad Hoover, Eric Kelly, Tyson Walter and Michael Westbrook (ECF No. 6533);

WHEREAS, Chidi Ahanotu, Terrell Davis, Brad Hoover, Eric Kelly, Tyson Walter and Michael Westbrook have since submitted written requests seeking to revoke their Opt Out requests (*see* Exhibit 1 (Declaration of Orran L. Brown));

WHEREAS, the Parties have agreed to accept the revocation requests submitted by Chidi Ahanotu, Terrell Davis, Brad Hoover, Eric Kelly, Tyson Walter and Michael Westbrook, subject to Court approval, because they submitted them before Opt Out litigation has commenced;

**AND NOW**, this 30th day of June, 2015, it is hereby stipulated and agreed by the Parties that the revocation requests submitted by Chidi Ahanotu, Terrell Davis, Brad Hoover, Eric Kelly, Tyson Walter and Michael Westbrook are accepted, subject to Court approval, because they submitted them before Opt Out litigation has commenced.

It is so **STIPULATED AND AGREED**,

By: 

Date: 6/30/2015

Christopher Seeger  
**SEEGER WEISS LLP**  
77 Water Street  
New York, NY 10005  
Phone: (212) 584-0700  
cseeger@seegerweiss.com

*Class Counsel*

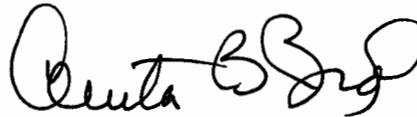
By: 

Date: June 30, 2015

Brad S. Karp  
**PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Phone: (212) 373-3000  
bkarp@paulweiss.com

*Counsel for the NFL Parties*

It is so **ORDERED**, based on the above Stipulation and the accompanying Declaration of Orran L. Brown, Sr., that the revocation requests submitted by Chidi Ahanotu, Terrell Davis, Brad Hoover, Eric Kelly, Tyson Walter and Michael Westbrook all are approved and the Claims Administrator is **DIRECTED** to post a revised list of Opt Outs forthwith excluding Chidi Ahanotu, Terrell Davis, Brad Hoover, Eric Kelly, Tyson Walter and Michael Westbrook.



ANITA B. BRODY, J.

July 1, 2015

Copies **VIA ECF** on \_\_\_\_\_ to:

Copies **MAILED** on \_\_\_\_\_ to:

1

1

# Exhibit 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

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: No. 2:12-md-02323-AB  
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MDL No. 2323

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:

ALL ACTIONS

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**DECLARATION OF ORRAN L. BROWN, SR.**

I, ORRAN L. BROWN, SR., hereby declare and state as follows:

1. My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC ("BrownGreer"), located at 250 Rocketts Way, Richmond, Virginia 23231.

2. I am over the age of 21. The matters set forth in this Declaration are based upon my personal knowledge and information.

3. I submit this Declaration to describe the Opt Out revocation requests that BrownGreer, as the Claims Administrator under the Class Action Settlement Agreement in this action ("Settlement Agreement"), has received since the Court entered its Final Approval Order and Judgment on April 22, 2015.

4. In its April 22, 2015 Final Approval Order and Judgment, the Court directed the Claims Administrator to post a list of Opt Outs as of that date. Accordingly, we posted on the official Settlement website a list of the 175 Opt Outs that were timely and included all elements required for a valid Opt Out under Section 14.2(a) of the Settlement Agreement (Exhibit 1 to this Declaration) (the "Opt Out List"), and a list of the 33 Opt Outs that were untimely and/or were missing one or more of Section 14.2(a)'s required elements (Exhibit 2

to this Declaration). Section 14.2(c) of the Settlement Agreement provides that a Class Member who had opted out but wished to revoke that Opt Out could submit a written request to do so “[p]rior to the Final Approval Date.” Since April 22, 2015, the following six Class Members included on the Opt Out List have submitted requests to revoke those Opt Outs:

- (a) Chidi Ahanotu: On June 1, 2015, Class Counsel received by email and forwarded to the Claims Administrator a revocation request signed by Mr. Ahanotu and dated June 1, 2015.
- (b) Terrell L. Davis: On May 4, 2015, the Claims Administrator received by mail a revocation request signed by Mr. Davis. The envelope containing the revocation request had no postmark date, but Mr. Davis dated his signature on the revocation request April 27, 2015.
- (c) Bradley R. Hoover: On June 15, 2015, Class Counsel received by email and forwarded to the Claims Administrator a revocation request signed by Mr. Hoover and dated June 4, 2015.
- (d) Eric F. Kelly: On April 28, 2015, the Claims Administrator received by mail a revocation request signed by Mr. Kelly and postmarked April 22, 2015.
- (e) Tyson B. Walter: On May 18, 2015, Class Counsel received by email and forwarded to the Claims Administrator a revocation request signed by Mr. Walter and dated May 15, 2015.
- (f) Michael Westbrook: On April 28, 2015, Class Counsel received by mail and forwarded to the Claims Administrator a revocation request signed by Mr. Westbrook and postmarked April 24, 2015.

5. I attach copies of the above revocation requests, which I have redacted to protect personal information (Exhibits 3-8 of this Declaration).

6. The Parties to the Settlement Agreement have agreed to accept the above revocation requests, subject to Court approval. If the Court grants its approval, the Claims Administrator will no longer count these six persons as Opt Outs and, upon direction of the Court, will post a revised Opt Out List excluding them on the Settlement website.

I, Orran L. Brown, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 30<sup>th</sup> day of June, 2015.

A handwritten signature in black ink, appearing to read "Orran L. Brown, Sr.", is positioned above a horizontal line.

---

Orran L. Brown, Sr.



**Exhibit 1**

**NFL Concussion Settlement: Timely Opt Out Requests Containing  
All Information Required by Section 14.2(a)  
(As of the April 22, 2015 Final Order and Judgment)**

	Notice ID	Last Name	First Name	Middle Name
<b>A. Retired NFL Players</b>				
1.	100000004	Abdullah	Hamza	
2.	100000031	Acks	Ronald	William
3.	100000097	Ahanotu	Chidi	
4.	100000146	Alexander, Jr.	Charles	F.
5.	100000340	Anderson	Ottis	J.
6.	100000449	Arnett	Jon	Dwane
7.	100000480	Ashley Jr.	Walker	Lee
8.	100000603	Bain	William	Ernest
9.	100000667	Ballard	Howard	
10.	100000749	Barnes	Billy	Ray
11.	100000787	Barnett	Timothy	
12.	100000834	Bass	Michael	Thomas
13.	100000870	Baugh	Thomas	Anthony
14.	100000875	Baumgartner	Steven	
15.	900001166	Beban	Gary	J.
16.	100000930	Bebout	Nick	
17.	100000982	Bell	Bobby	L.
18.	100000993	Bell	Gregory	Leon
19.	100001131	Berton	Sean	
20.	100001142	Bethea	Elvin	L.
21.	100001171	Bielski	Richard	Adam
22.	100001186	Bing	Darnell	L.
23.	N/A	Blackshear	Rodney	T.
24.	100001383	Bonness	Richard	K.
25.	100001596	Brannon	Robert	
26.	100001671	Brightful	Lamont	
27.	N/A	Brooks IV	Robert	L.
28.	100001926	Brown	Ronald	
29.	100002027	Bryant	Trent	B.
30.	100002378	Campbell	Woodrow	Lamar
31.	100002497	Carter	Tyrone	
32.	100002768	Clapp, II	Thomas	P.
33.	100002875	Cline, Jr.	Anthony	Francis
34.	100002899	Cobb	Marvin	Lawrence
35.	100003090	Commiskey	Charles	E.
36.	100003166	Cooper	Alexander	Louis
37.	100003197	Cordileone	Louis	
38.	100003223	Cosbie	Douglas	
39.	100003414	Crumpler	Algernon	D.
40.	100003415	Crumpler	Carlester	T.
41.	100003729	Davis	Terrell	Lamar

**Exhibit 1**

**NFL Concussion Settlement: Timely Opt Out Requests Containing  
All Information Required by Section 14.2(a)  
(As of the April 22, 2015 Final Order and Judgment)**

	Notice ID	Last Name	First Name	Middle Name
42.	400000182	DeCarlo, Sr.	Arthur	A.
43.	100003858	Dennis, III	Albert	R.
44.	100004084	Dorris	Andrew	Michael
45.	100004087	Dorsett	Tony	
46.	100004120	Douglas	Cody	
47.	100004136	Douglass	Bobby	
48.	100004354	Eber	Richard	Lee
49.	100004372	Edelman	Bradley	Mart
50.	100004651	Fahnhorst	Keith	V.
51.	100004666	Fanning	Michael	Lavern
52.	100004887	Flatley	Paul	R.
53.	100005000	Forsberg	Fred	C
54.	100005216	Gabriel	Roman	
55.	100005391	Gayle	Shaun	
56.	100005739	Grant	Robert	B.
57.	100005759	Gray	Quinn	F.
58.	100005848	Green	Roy	
59.	100005904	Grier	Roosevelt	
60.	100005920	Griffin, Jr.	Leonard	James
61.	900007679	Hackett	Barry	Dean
62.	100006151	Hamilton	Ben	
63.	100006449	Harrison	Jerome	Charles
64.	100006475	Harry	Emile	Michael
65.	900008386	Healy Jr.	William	R.
66.	100006814	Hicks	Dwight	
67.	100006856	Hill	Calvin	
68.	100006877	Hill	Kent	
69.	900008737	Hilliard	Lex	Douglas
70.	100007115	Hoover	Bradley	Ray
71.	100007134	Horn	Joseph	
72.	100007437	Iorio	Joseph	W.
73.	100007672	Jarvis	John	Bruce
74.	100007707	Jefferson, Jr.	Roy	Lee
75.	100007809	Johnson Jr.	Ted	C.
76.	100008137	Jones	Donald	Ray
77.	100008151	Jones	Frederick	Cornelius
78.	100008471	Kelly	Eric	Francheste
79.	190000195	Kelly, II	Patrick	
80.	100008513	Kenney	William	Patrick
81.	100008632	Kingsriter	Douglas	James
82.	100008766	Kosar	Bernard	J.
83.	100008792	Krakau	Mervin	F.
84.	100008806	Krause	Paul	James

**Exhibit 1**

**NFL Concussion Settlement: Timely Opt Out Requests Containing  
All Information Required by Section 14.2(a)  
(As of the April 22, 2015 Final Order and Judgment)**

	Notice ID	Last Name	First Name	Middle Name
85.	100008953	Lanier, Sr.	Willie	Edward
86.	250014001	LaRose	Marvin	Daniel
87.	100008975	Larson	Gregory	K.
88.	100009197	Lewis	Albert	R.
89.	100009442	Lowe	Woodrow	
90.	100009489	Lurtsema	Robert	Ross
91.	100009748	Martin	Christopher	
92.	900012555	Massaquoi	Mohamed	Jah
93.	100009880	May, Jr.	Bert	Deems
94.	100009925	McAlister	Christopher	James
95.	100009928	McAllister	Dulymus	J.
96.	100010101	McDougle Jr.	Jerome	
97.	100010305	McNair	Todd	D.
98.	100010404	Merritt Sr.	David	L.
99.	100010586	Mincy	Charles	
100.	100010854	Morey	Sean	J.
101.	100010936	Morton	Larry	Craig
102.	100011184	Nelson	Jimmie	Dirk
103.	100011178	Nelson	Curtis	Shane
104.	100011289	Niswanger	Rudolph	N.
105.	100011497	Oliver	Darryl	H.
106.	100011513	Olkewicz	Neal	
107.	100011639	Owens	Mel	T.
108.	100011685	Palmer	Paul	W.
109.	100011709	Parker	J'vonne	
110.	100011767	Parrish	Bernard	P.
111.	100011790	Pastorini	Dan	
112.	100011803	Patrick	Allen	
113.	100011868	Pearson	Jayice	
114.	270006144	Phillips	Joseph	Gordon
115.	100012247	Porter	Kevin	
116.	100012313	Preece	Steven	Packer
117.	100012362	Pritchard	Ronald	David
118.	N/A	Ragon	Randy	D.
119.	100012615	Reed	Andre	D.
120.	100012714	Rentzel	Thomas	L.
121.	100012836	Riggins	Robert	John
122.	100012979	Robinson	Johnny	Nolan
123.	100013051	Rogers	George	W.
124.	100013192	Royal, Jr.	Robert	S.
125.	900017334	Schaefering	Brian	Christopher
126.	110021920	Scott	Edward	
127.	100013596	Scott III	Jacob	E

**Exhibit 1**

**NFL Concussion Settlement: Timely Opt Out Requests Containing  
All Information Required by Section 14.2(a)  
(As of the April 22, 2015 Final Order and Judgment)**

	Notice ID	Last Name	First Name	Middle Name
128.	100013646	Seals	George	E.
129.	110029965	Seau, Jr.	Tiaina	B.
130.	100013686	Senser	Joseph	M.
131.	N/A	Sharpe	Luis	
132.	100013804	Sherk	Jerry	Martin
133.	100013941	Simonini	Ed	
134.	N/A	Simpson	William	C.
135.	900018004	Sims, Jr.	George	Pollard
136.	100014138	Smith	Chris	M.
137.	100014204	Smith	John	Thomas
138.	100014196	Smith	Jesse	Daley
139.	100014241	Smith	Neil	O.
140.	N/A	Stant	Patrick	M.
141.	100014534	Steed	Joel	E.
142.	100014548	Stein	Robert	Allen
143.	100014641	Still	Arthur	B.
144.	100014948	Tant	Jay	W.
145.	100015103	Terry	Douglas	Maurice
146.	100015394	Toefield	LaBrandon	
147.	100015506	Truax, III	William	F.
148.	900019945	Trufant	Marcus	Lavon
149.	100015812	Voigt	Stuart	A.
150.	100015903	Walker	George	
151.	100015970	Walls	Charles	Wesley
152.	100015983	Walter	Tyson	Barrett
153.	100016103	Washington	Mark	H.
154.	100016289	Westbrook	Michael	
155.	100016353	White	Edward	Alvin
156.	100016462	Wilbur	John	
157.	100016704	Williams	Ralph	
158.	100017090	Wright	Jeffrey	Ralph
159.	100017160	Yary	Anthony	Ronald
	<b>Subtotal of Retired NFL Football Players</b>		<b>159</b>	

**B. Relatives of a Retired NFL Football Player**

160.	N/A	Baugh	Jean	M.
161.	270001721	Davis	Roberta	Lee
162.	190000014	Kelly	Kari	
163.	N/A	Kelly, III	Patrick	
164.	N/A	Kenney	Sandra	Louise
165.	270000922	Lamana	Virginia	P
166.	270000201	Lesane	Elizabeth	Turner

Exhibit 1

**NFL Concussion Settlement: Timely Opt Out Requests Containing  
All Information Required by Section 14.2(a)  
(As of the April 22, 2015 Final Order and Judgment)**

	Notice ID	Last Name	First Name	Middle Name
167.	270003553	Phillips	Elizabeth	D.
168.	190000357	Seau	Hunter	
169.	190000326	Seau	Jake	R.
170.	N/A	Seau	Luisa	
171.	190000262	Seau	Sydney	B.
172.	N/A	Seau	Tiaina	
173.	N/A	Seau	Tyler	C.
174.	N/A	Smith	Dione	Elizabeth
175.	N/A	Tant	Natalie	
	<b>Subtotal of Relatives of a Retired NFL Football Player</b>		<b>16</b>	
	<b>TOTAL</b>		<b>175</b>	



**Exhibit 2**

**NFL Concussion Settlement: Opt Out Requests That Were Untimely and/or Did Not Contain All Information  
Required by Section 14.2(a)**  
(As of the April 22, 2015 Final Order and Judgment)

Class Member Information					Section 14.2(c) Opt Out Revocation Requirements						
	Notice ID	Last Name	First Name	Middle Name	Address Provided?	Phone Number Provided?	Date of Birth Provided?	Government ID Provided?	Personal Signature Provided?	Signature Date Provided?	Timely Submitted?*
A. Retired NFL Players											
1.	900000677	Babineaux	Jordan		Yes	Yes	Yes	Yes	Yes	Yes	No (10/15/14)
2.	100001107	Bernard	Walter		Yes	No	Yes	Yes	Yes	No	Yes
3.	100001125	Berry	Reginald	Dennis	Yes	Yes	Yes	Yes	Yes	Yes	No (1/13/15)
4.	100001190	Bingham	Gregory	Raleigh	Yes	No	Yes	Yes	Yes	Yes	Yes
5.	100001264	Blair	Michael		Yes	No	Yes	Yes	Yes	No	Yes
6.	100001779	Brown	Mike		No	No	No	No	No	No	Yes
7.	100002077	Buggs	Daniel		Yes	Yes	Yes	Yes	Yes	Yes	No (10/15/14)
8.	100002078	Buggs	Wamon	C.	Yes	Yes	Yes	Yes	Yes	Yes	No (10/17/14)
9.	110017237	Bush	Lewis	F.	Yes	No	No	Yes	Yes	Yes	Yes
10.	100002556	Carver	Shante		Yes	No	Yes	Yes	Yes	Yes	Yes
11.	100002966	Cole Sr.	Robin		Yes	Yes	Yes	Yes	Yes	Yes	No (10/15/14)
12.	100003583	Darling	Devard		Yes	No	Yes	Yes	Yes	Yes	Yes
13.	100003600	David	Jason		Yes	No	Yes	Yes	Yes	Yes	Yes
14.	260000647	Hamilton	Harry	E.	Yes	Yes	No	No	Yes	Yes	Yes
15.	N/A	Harris	Charles	W.	Yes	Yes	Yes	Yes	Yes	Yes	No (10/31/14)
16.	100007484	Izzo	Larry		Yes	No	Yes	Yes	No	Yes	Yes
17.	100008503	Kennedy, Jr.	Jimmy	Wayne	Yes	No	Yes	Yes	Yes	Yes	Yes
18.	250016542	Meisner	Lee	Edward	Yes	No	Yes	Yes	Yes	Yes	Yes
19.	100010601	Minter	Cedric		Yes	No	Yes	No	Yes	Yes	Yes
20.	100010609	Miree	Brandon	C.	Yes	Yes	Yes	Yes	Yes	No	Yes
21.	250015226	Moffitt	John		Yes	Yes	Yes	Yes	Yes	Yes	No (11/10/14)
22.	100011625	Owens	Brigman		Yes	No	Yes	Yes	Yes	Yes	Yes
23.	100011984	Peters	Scott		Yes	Yes	Yes	No	Yes	Yes	Yes
24.	N/A	Richards	Rex		Yes	Yes	Yes	Yes	Yes	Yes	No (10/22/14)
25.	260010034	Rudnay	John	Carl	Yes	No	Yes	Yes	Yes	Yes	Yes
26.	100014530	Steagall	Derrick		Yes	Yes	Yes	Yes	Yes	No	Yes
27.	100014657	Stoepel	Terry		Yes	Yes	Yes	Yes	Yes	No	No (10/22/14)
28.	100015152	Thomas	Charles	G.	Yes	No	Yes	Yes	Yes	Yes	Yes
	Subtotal of Retired NFL Football Players				28						
B. Relatives of a Retired NFL Football Player											
29.	N/A	Bush	Danielle		Yes	No	Yes	Yes	Yes	Yes	Yes
30.	190000166	Bush	Deedee		Yes	No	Yes	Yes	Yes	Yes	Yes
31.	N/A	Bush, Jr.	Lewis	F.	Yes	No	Yes	Yes	Yes	Yes	Yes
32.	N/A	Bush	Makai		Yes	No	Yes	Yes	Yes	Yes	Yes
33.	N/A	Rogers	Loretta		No	No	No	No	No	No	No (10/20/14)
	Subtotal of Relatives of Retired NFL Football Players				5						
	TOTAL				33						

\*This column shows the date of submission for any untimely attempted Opt Out.

Christopher Seeger  
Co-Lead Class Counsel  
SEEGER WEISS, LLP  
77 Water Street  
New York, NY 10005

Sol Weiss  
Co-Lead Class Counsel  
ANAPOL SCHWARTZ  
1710 Spruce Street  
Philadelphia, PA 19103

Brad Karp  
Counsel for the NFL Parties  
Paul Weiss Rifkind Wharton & Garrison, LLP  
1285 Avenue of the Americas  
New York, NY 10019

Re: **REVOCATION OF OPT OUT FROM SETTLEMENT CLASS**

Dear Counsel:

Please take notice that I, Chidi Ahanotu, wish to revoke my request to be excluded from the Settlement Class in *In re: National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323.

Name:

Chidi Ahanotu

Address:

**REDACTED**

Phone No.:

Date of Birth:

Signature:



Print Name:

Chidi Ahanotu

Date:

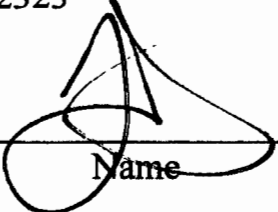
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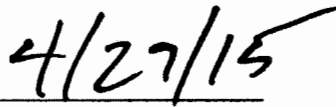
cc: Jason E. Luckasevic

Terrell Davis

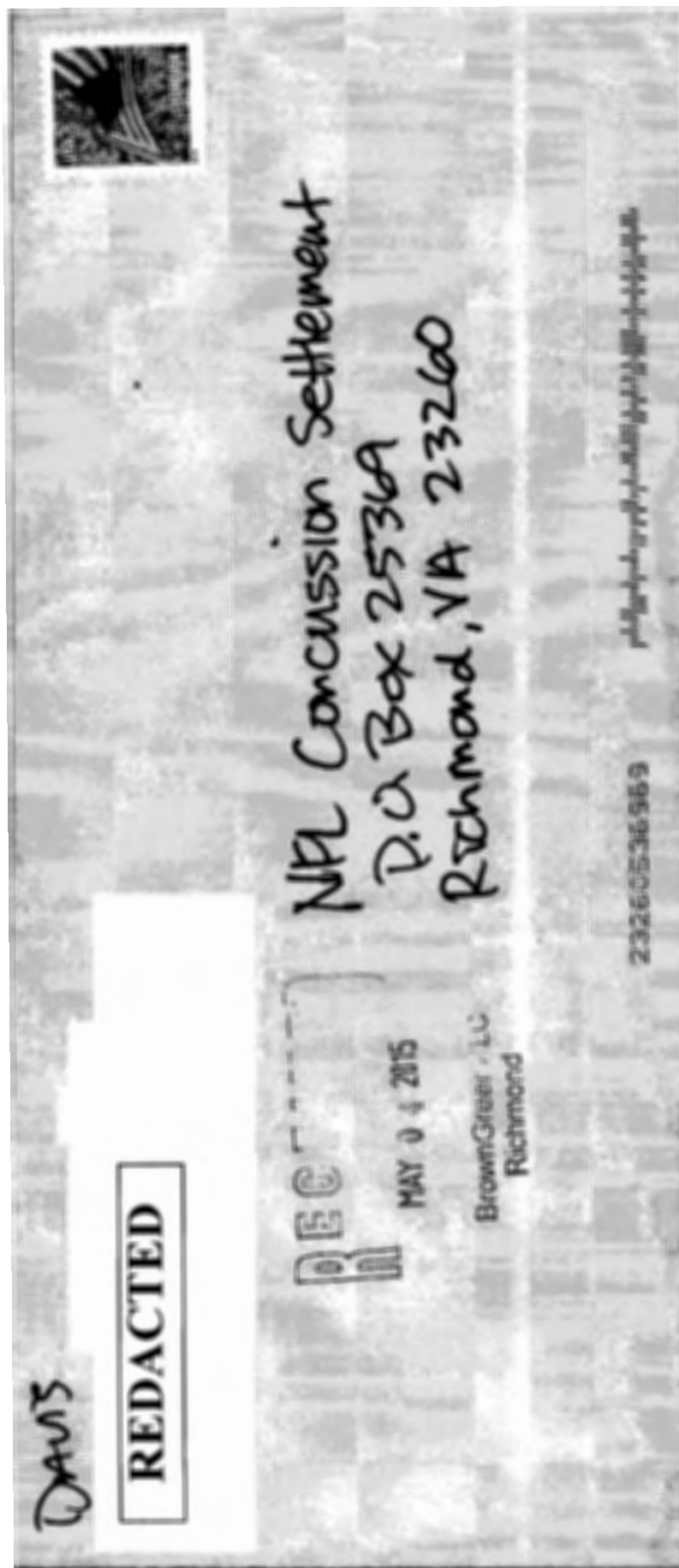
**REDACTED**

I wish to revoke my request to be excluded from the Settlement Class in In re:  
National Football League Players' Concussion Injury Litigation, No. 2:12-  
md-02323"

  
\_\_\_\_\_  
Name

  
\_\_\_\_\_  
Date





June 4, 2015

Christopher A. Seeger, Esquire  
Seeger Weiss LLP  
77 Water Street  
New York, New York 10005

Jeffrey Pash, Esquire  
National Football League  
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Anastasia Danias, Esquire  
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Brad S. Karp, Esquire  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, New York 10019

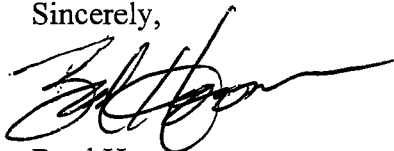
Re: *In re: National Football League Players' Concussion Injury Litigation*  
No. 2:12-md-02323 (E.D. Pa.)

Dear Counsel:

I wish to revoke my request to be excluded from the Settlement Class. Please advise if further information is needed so I may participate in the Settlement Agreement. You may also contact my attorney, Anne McGinness Kearse at Motley Rice (843.216-9140) or her paralegal, Lisa Rinaldo (843.216.9637).

Thank you for your cooperation in this matter.

Sincerely,



Brad Hoover

**REDACTED**

April 21, 2015

Christopher A. Seeger  
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Dianne M. Nast, Counsel –  
Counsel - Subclass 2  
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Philadelphia, Pennsylvania 19107

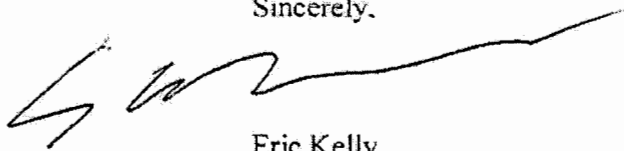
**Re:** Civil Action No. 2:12-md-02323 MDL No. 2323; *In Re: National Football League Players' Concussion Injury Litigation*; In the United State District Court for the Eastern District of Pennsylvania.

Civil Action No.2: 12-cv-05042-AB; *Larry Centers, et al. vs. National Football League, et al.*; In the United State District Court for the Eastern District of Pennsylvania.

To Whom It May Concern:

Effectively immediately, please let this letter serve as my wish to REVOKE my request to be excluded from the Settlement Class.

Sincerely,



Eric Kelly

**REDACTED**

cc: NFL Concussion Settlement  
P.O. Box 25369  
Richmond, VA 23260



LUBEL VOYLES LLP

RECEIVED  
APR 28 2015

BrownGreer PLC  
Richmond

5020 Montrose Blvd.  
Suite 800  
Houston, Texas 77006

CERTIFIED MAIL



7012 2920 0001 6493 2004

NFL Concussion Settlement  
P.O. Box 25369  
Richmond, VA 23260

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Tyson B. Walter

**REDACTED**

Claims Administrator  
NFL Concussion Settlement  
P.O. Box 25369  
Richmond, VA 23260

Dear Claims Administrator:

My name is Tyson Barrett Walter, and I live at **REDACTED** My birthday is **REDACTED** and my assigned identification number for this case is

I am contacting you because as of this day, May 15, 2015, I hereby exercise my right to rescind my order excluding myself from the Settlement Class ("opt out") as detailed in the letter provided to the Claims Administrator and dated October 13, 2014. I therefore wish to include myself ("opt in") in the Settlement Class in **In re: National Football League Players' Concussion Injury Litigation, No. 2:12-md-02323**.

It is my understanding that this notice to "opt in" will be granted and become effective upon receipt as Final Order/Approval is not effective until the latter of the 30 day Appeals window expiring without any filings or the date on which any and all filed Appeals have been fully resolved. Therefore, as Final Order/Approval has yet to, and cannot, occur until May 22, 2015 at the earliest, the rights to rescind my previous notification remain valid as of the date of this notice, May 15, 2015.

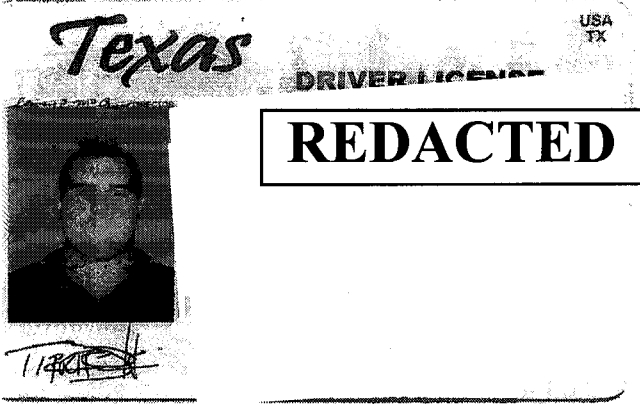
With this in mind, and per instructions from the Class' Co-Lead Counsel (with the understanding that said instructions were provided to me in general and solely as a member of the Class and that I have not retained any council or party to specifically represent me in this or any matter), I hereby exercise my right to contact you by letter, postmarked prior to the Final Order/Approval becoming effective and, using the same identity authentication as previously presented, rescind my order to "opt out" of the aforementioned proposed class action settlement. Therefore, upon receipt of this notification, full rights relating to the Settlement Class in **In re: National Football League Players' Concussion Injury Litigation, No. 2:12-md-02323** shall be restored to myself, Tyson Barrett Walter, and/or my estate, for the entire duration of said settlement.

Please confirm receipt of this notice, and its effectiveness, via letter (to the address above and on file), or email **REDACTED**. Additionally, I may be reached by phone **REDACTED** should you have any comments or questions.

Sincerely,



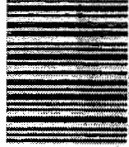
Tyson B. Walter



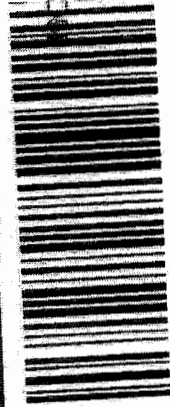
WALTER

REDACTED

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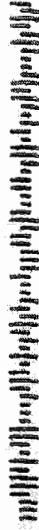
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MAY 21 2015

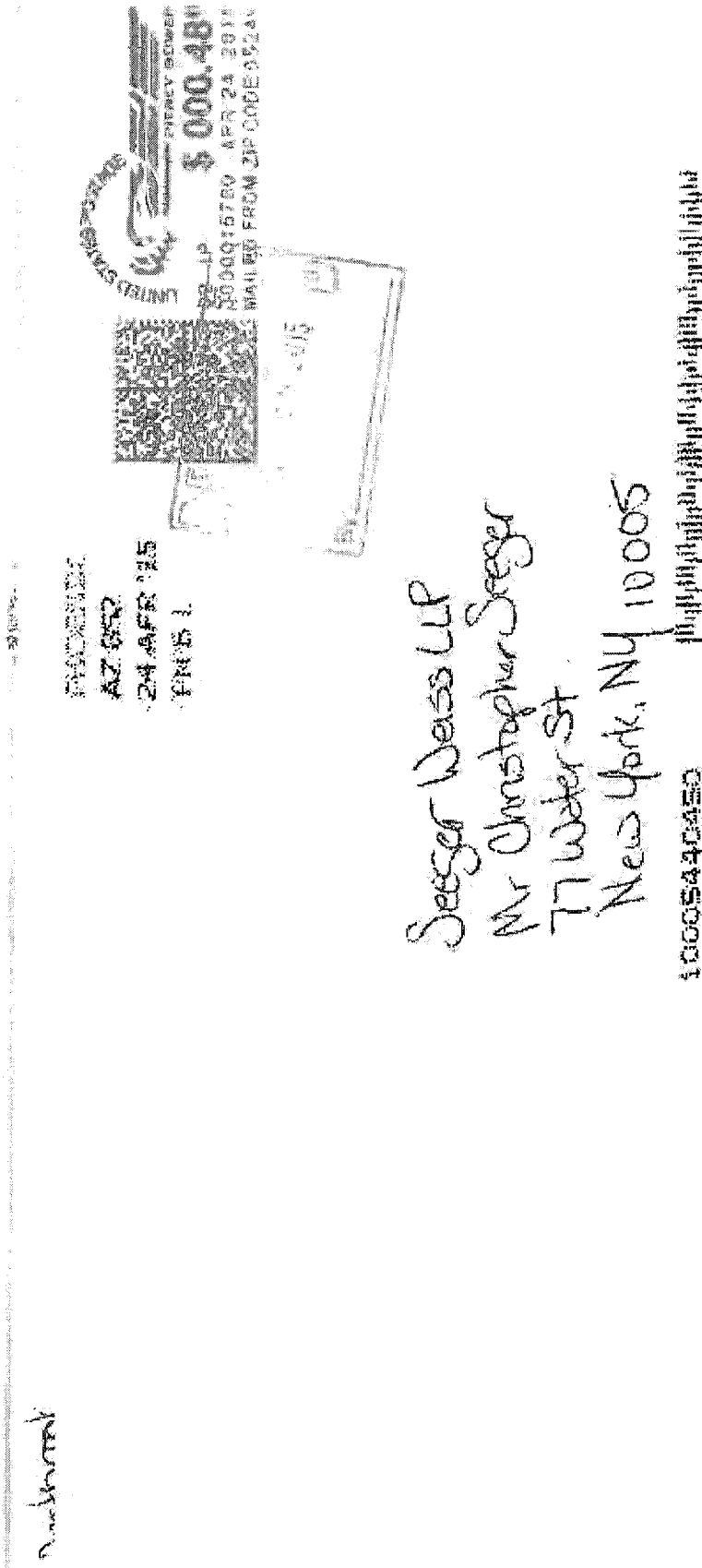
BrownGreer PLC  
Richmond

CLAIMS ADMINISTRATOR  
NFL CONCUSSION SETTLEMENT  
P.O. BOX 25369  
RICHMOND, VA 23260

23260536969







**CERTIFICATE OF SERVICE**

I hereby certify that, on July 1, 2015, the foregoing document was transmitted electronically via CM/ECF to the Clerk of the Court for filing and transmittal of Notice of Electronic Filing to all attorneys of record who are ECF registrants.

Dated: July 1, 2015

/s/ Christopher A. Seeger

Christopher A. Seeger

Seeger Weiss LLP

77 Water St. 26th Floor

New York, NY 10005

Phone: 212-584-0700

Email: Cseeger@seegerweiss.com

***Attorney for Plaintiffs***